

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

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KIM C. BLOCK, Individually and on Behalf	:	
of All Others Similarly Situated,	:	
	:	
Plaintiff,	:	
	:	
v.	:	
	:	Civil Action No. 3:18-cv-00007-K
INTEROIL CORPORATION, EXXON	:	Hon. Ed Kinkeade
MOBIL CORPORATION, MICHAEL	:	
HESSION, CHRISTOPHER FINLAYSON,	:	
CHEE KEONG YAP, DR. ELLIS	:	
ARMSTRONG, FORD GRANT	:	
NICHOLSON, ISIKELI REUBEN	:	
TAUREKA, SIR WILSON KAMIT, and SIR	:	
RABBIE L. NAMALIU,	:	
	:	
Defendants.	:	
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**STIPULATION AND PROPOSED ORDER**

WHEREAS, on January 2, 2018, Kim C. Block filed a putative class action complaint (the “Original Complaint”) asserting a claim against InterOil Corporation (“InterOil”), Exxon Mobil Corporation (“ExxonMobil”), and Michael Hession, Christopher Finlayson, Chee Keong Yap, Dr. Ellis Armstrong, Ford Grant Nicholson, Isikeli Reuben Taureka, Sir Wilson Kamit, and Sir Rabbie L. Namaliu (collectively, the “Individual Defendants”) under Section 12(a)(2) of the Securities Act of 1933 (the “Securities Act”);

WHEREAS, the Original Complaint in the above-captioned action (the “Action”) is governed by the provisions of the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), which provides for a specific process for the appointment of lead plaintiff and lead counsel to represent the putative class;

WHEREAS, on March 5, 2018, Melanie A. Cissone (“Plaintiff”) filed a motion (the “Motion”) for appointment as lead plaintiff and for approval of her selection of lead counsel in the Action (Dkt. No. 10);

WHEREAS, Plaintiff’s Motion was the only motion for the appointment of lead plaintiff and approval of selection of lead counsel filed by the statutory deadline;

IT IS HEREBY STIPULATED AND AGREED by the undersigned attorneys that:

1. The time by which any defendant must answer, move against, or otherwise respond to the Original Complaint in the Action shall be deferred until after the appointment of lead plaintiff, approval of selection of lead counsel for lead plaintiff, and entry of a stipulation among lead plaintiff and all defendants, or Court order, setting forth a schedule for the filing of an amended complaint and defendants’ responses thereto. Any defendant that has been served with the Original Complaint and summons is expressly relieved from answering, moving against, or otherwise responding to the Original Complaint.

2. A stipulation setting forth the proposed schedule for the filing of an amended complaint by lead plaintiff and defendants’ responses thereto shall be submitted to the Court no later than 15 days following the entry of an order by the Court appointing lead plaintiff and approving the selection of lead counsel pursuant to the PSLRA.

3. Nothing in this stipulation constitutes a waiver by any party to the Action of any claims or defenses in this Action or any other matter.

4. There have been no requests for an extension of time in this matter.

Dated: March 6, 2018

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*Counsel for Plaintiff Melanie A. Cissone*

Dated: March 6, 2018

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\* *pro hac vice* application forthcoming

*Counsel for Defendants InterOil Corporation and Exxon Mobil Corporation*

SO ORDERED:

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Dated

\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE